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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of) MM Docket No. 93-259
)
Amendment of Section 73.202(b),) RM-8341
Table of Allotments,)
FM Broadcast Stations)
(Earle, Arkansas))

To: Chief, Allocations Branch

**COMMENTS AND COUNTERPROPOSAL OF
BROADCASTERS & PUBLISHERS, INC.**

Broadcasters & Publishers, Inc. ("BPI"), licensee of station WWKZ(FM), Channel 278C, New Albany, Mississippi, by its attorneys and pursuant to Section 1.420 of the Commission's rules, hereby submits its comments and counterproposal in response to the Notice of Proposed Rule Making released by the Commission in this proceeding on September 30, 1993 ("Notice").

BPI requests that Channel 278C be allotted to Como, Mississippi, in substitution for Channel 278C at New Albany, Mississippi, and that its community of license be modified accordingly. In order to accommodate its request, BPI further proposes that Channel 234A be substituted for Channel 279A at Wilson, Arkansas. Channel 234A at Wilson, Arkansas, is mutually exclusive with the proposed allotment of Channel 234C3 at Earle. As demonstrated by the Technical Statement and Exhibits, appended hereto as Exhibit A, there are two options available which would allow BPI to operate on Channel 278C at Como.

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I. Background

Earle Broadcasting ("EB") is requesting the allotment of FM Channel 234C3 to Earle, Arkansas, as that community's first local aural transmission service. The Allocations Branch has determined that Channel 234C3 can be allotted to Earle with a site restriction of at least 8.8 kilometers (5.4 miles) northeast of Earle. Notice at note 1. Earle is located within the Memphis Metropolitan Statistical Area.

BPI proposes to substitute Channel 278C at Como, Mississippi for Channel 278C at New Albany, Mississippi. Como has no locally licensed broadcast facility. Como is located in northern Panola County, Mississippi, and has a 1990 population of 1,387 persons according to the U.S. Census. Como is an incorporated community governed by a Mayor and five member Board of Alderman. Como provides police and fire services to its residents and businesses, as well as water and sewer service. Como also has a post office and city library. In addition to numerous businesses and civic organizations, there are also nine churches in the community. Como is not located in an Urbanized area nor is it located in any Statistical Metropolitan Area.

In the event that the Commission grants BPI's counterproposal and modifies WWKZ's community of license to specify Como, New Albany will retain a full-time AM station, WNAU, 1470 KHz, and an FM station, WWZD, Channel 294C2. In

addition, WWKZ would still provide city grade service to New Albany from its proposed reference site at Como.

II. Option 1

Channel 278C can be allotted to Como with a site restriction of 60.1 kilometers east-northeast of Como to avoid numerous short-spacings. See Technical Statement, note 4. Channel 234A can be allotted to Wilson, Arkansas with a site restriction of 14.1 kilometers southwest of Wilson. The allotment of Channel 234A to Wilson is mutually exclusive with the allotment of Channel 234C3 to Earle.^{1/}

In view of the foregoing, BPI requests that Section 73.202(b) of the Commission's Rules be amended as follows:

Como, Mississippi

Present
None

Proposed
278C

^{1/} Presently, Channel 279A is allotted to Wilson. The construction permit for Channel 279A, KOSE-FM, (File No. BPH-891129M1) expired on **September 28, 1992**. The permittee, Pollack Broadcasting Company, filed an application to replace the expired construction permit (File No. BPH-921023JV), which was denied by letter dated March 4, 1993 (Reference No. 1800B3-RAB), a copy of which is appended as Exhibit B hereto. On March 4, 1993, Pollack filed a petition for reconsideration of the Commission's denial of its application; the petition is still pending.

In the event that the construction permit were to be reinstated, Pollack has agreed to accept Channel 234A in lieu of Channel 279A. A copy of Pollack's agreement is appended hereto as Exhibit C. If the construction permit is not reinstated, however, Channel 279A could be deleted from Wilson with no substitution of channels, permitting the allotment of both Channel 234C3 to Earle and Channel 278C to Como.

New Albany, Mississippi

Present
278C, 294C2

Proposed
294C2

Wilson, Arkansas

Present
279A

Proposed
234A or None

Earle, Arkansas

Present
None

Proposed
None

The allotment of Channel 278C to Como is in the public interest and should be preferred over the allotment of Channel 234C3 to Earle. A maximum Class C facility at Como will provide service to 1,050,536 people in an area of 21,479.2 square kilometers. This represents service to 719,279 more people than BPI serves from its existing facilities at New Albany. On the other hand, EB proposes service to 81,491 people in an area of 4,794 square kilometers.^{2/}

III. Option 2

In the event that the Commission concludes that an allotment should be made to Earle, BPI has determined that Channel 280C3, rather than Channel 234C3 could be allotted to Earle without conflicting with the allotment of Channel 278C to Como, provided the transmitter is located at least 15.1 kilometers west of Earle. In order to accommodate this option, Channel 279A must be

^{2/} As noted above, Earle is located within the Memphis Statistical Metropolitan Area. Como is located within neither the Memphis Urbanized Area nor any Statistical Metropolitan Area.

substituted by Channel 234A (or deleted without substitution in the event that KOSE-FM's construction permit is cancelled) and Channel 280A, Pocahontas, Arkansas, must be substituted by Channel 281A,^{3/} provided the transmitter is located at least 7.4 kilometers from Pocahontas.

Accordingly, BPI proposes the following alternative amendment to the FM Table of Allotments:

Como, Mississippi

Present
None

Proposed
278C

New Albany, Mississippi

Present
278C, 294C2

Proposed
294C2

Wilson, Arkansas

Present
279A

Proposed
234A or None

Earle, Arkansas

Present
None

Proposed
234C3 or 280C3

Pocahontas, Arkansas

Present
280A

Proposed
281A

^{3/} Channel 281A does not meet the Commission's minimum distance separation requirements at the present transmitter site of Station KPOC-FM. Scott Media Services, licensee of KPOC-FM, has voluntarily agreed to accept Channel 281A and relocate its transmitter site to comply with the Commission's minimum distance separation requirements. A copy of Scott Media's agreement is appended hereto as Exhibit D.

The public interest would be well served by this Option. Both Earle and Como will receive first local service, and KPOC-FM would be able to operate as a 6 kilowatt Class A facility from its present site, enabling the station to increase its population coverage from 13,195 people to 17,639 people.

In the event that the Commission approves either of the foregoing options, BPI intends to promptly seek the necessary modifications to its license and construct the necessary facilities to serve Como.

IN VIEW OF THE FOREGOING, BPI respectfully requests that the Commission amend its FM Table of Allotments as proposed herein.

Respectfully submitted,

BROADCASTERS AND PUBLISHERS, INC.

By:



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Its Attorneys

November 18, 1993

EXHIBIT A

COMMENTS AND COUNTERPROPOSAL
MM DOCKET #93-259
BROADCASTERS & PUBLISHERS, INC.
WWKZ RADIO STATION
ALLOT CHANNEL 278C
COMO, MISSISSIPPI
November 1993

Technical Exhibit

TE-1

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St. Simons Island, Georgia 31522
(912) 638-5608

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COMMENTS AND COUNTERPROPOSAL
MM DOCKET #93-259
BROADCASTERS & PUBLISHERS, INC.
WWKZ RADIO STATION
ALLOT CHANNEL 278C
COMO, MISSISSIPPI
November 1993

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Broadcasters & Publishers, Inc. ("BPI"), licensee of station WWKZ, Channel 278C, New Albany, Mississippi. BPI requests that Channel 278C be allotted to Como, Mississippi, in substitution for Channel 278C at New Albany, Mississippi, and also requests that WWKZ be ordered to change its community of license. In order to accommodate its request, BPI further requests that Channel 234A be substituted for Channel 279A at Wilson, Arkansas. Channel 234A at Wilson, Arkansas, is mutually exclusive with the proposed allotment of Channel 234C3 at Earle, Arkansas, as proposed in MM Docket #93-259.

NOTICE OF PROPOSED RULE MAKING

2. In the Notice of Proposed Rule Making ("NPRM"), MM Docket # 93-259, Earle Broadcasting ("Petitioner") has requested the allotment of Channel 234C3 at Earle, Arkansas, as that community's first local broadcast outlet. In its original request, the petitioner notes that Earle is a town

located in Crittenden County with a 1990 population of 3,393 persons. A site restriction of 8.8 kilometers is necessary for the proposed allotment to avoid shortspacing other Commission licensed facilities on the same or adjacent channels.

COMMENTS AND COUNTERPROPOSAL

3. BPI requests that the Commission re-allot Channel 278C from New Albany, Mississippi, to Como, Mississippi, as that community's first local service. Como presently has no locally licensed broadcast facility. Como is located in northern Panola County, Mississippi, and has a 1990 population of 1,387 persons according to the U.S. Census. Como is an incorporated community with a Mayor and five member Board of Alderman. Como provides police and fire services to its residents and businesses, as well as water and sewer service. Como also has a post office and city library. There are numerous businesses and civic organizations in Como, including Rotary and garden clubs. There are also nine churches in the community.

4. New Albany, Mississippi, will retain a full time AM station, WNAU, 1470 kHz, and an FM station, WWZD, Channel 294C2, once WWKZ is relocated to Como, Mississippi. In

addition, WWKZ would still provide city grade service to New Albany from its proposed reference site at Como. It should be noted that Como, Mississippi, is not located in an Urbanized area, as defined by the Census Department, nor is it located in any Statistical Metropolitan Area. The allotment of Channel 278C at Como, Mississippi, is mutually exclusive with the Channel 278C allotment at New Albany, Mississippi. 1

5. In order to allocate Channel 278C to Como, Mississippi, it is necessary to substitute Channel 234A for Channel 279A at Wilson, Arkansas. The allocation of Channel 234A to Wilson is mutually exclusive with the proposed allotment of Channel 234C3 to Earle, Arkansas. 2 There are no other Class A channels which can be utilized as a substitute channel at Wilson, Arkansas. 3 Earle, Arkansas,

- 1) §73.207 of the Commissions rules require that Co-Channel Class C channels be separated by 290 kilometers. The reference site for Channel 278C at Como is only 40.4 kilometers from the present licensed site for WWKZ at New Albany, Mississippi.
- 2) §73.207 of the Commissions rules require that Co-Channel Class A and Class C3 channels be separated by 142 kilometers. The Wilson and Earle, Arkansas, proposals are separated only by 40.3 kilometers,
- 3) The construction permit for KOSE-FM, Channel 279A, Wilson, Arkansas, was cancelled and the call sign deleted by the Commission on March 4, 1993. The permittee, Pollack Broadcasting, filed a Petition for Reconsideration of that action on April 5, 1993. Should the Commission not reinstate the KOSE-FM permit, Channel 279A could be deleted from Wilson, Arkansas with no substitution of channels, thus allowing for the allotment of Channel 234C3 to Earle, Arkansas and Channel 278C to Como, Mississippi.

while not within the Memphis Urbanized area, is within the Memphis Statistical Metropolitan area.

6. The allotment of Channel 278C at Como, Mississippi should be preferred over the allotment of Channel 234C3 at Earle, Arkansas. A maximum Class C facility, from the reference site noted below for Como, Mississippi, will provide 1.0 mV/m service to 1,050,536 persons in 26,479.2 square kilometers. A Class C3 facility at Earle, Arkansas, will provide 1.0 mV/m service to 81,491 persons in 4,794.5 square kilometers.

REQUEST (Option 1)

7. Channel 278C can be allotted to Como, Mississippi with a site restriction of 60.1 kilometers east-northeast of the community to avoid shortspacing numerous other facilities. 4 The reference coordinates for Channel 278C at Como, Mississippi, are North Latitude 34° 32' 56" and West Longitude 89° 17' 04". From the reference site, a 3.16 mV/m signal will be delivered to Como, Mississippi. Exhibit #1 is

4) The site restriction is to protect KEGT, Channel 278A, Lake Village; KCRI-FM, Channel 276C3, Helena,; KWOZ, Channel 277C, Mountain View; KKYK, Channel 279C, Little Rock (all Arkansas); and WWFS, Channel 277C3, Kosciusko, Mississippi.

a usable site area for Channel 278C at Como, Mississippi. Exhibit #2 is a \$73.207 spacing study for Channel 278C, which demonstrates that the channel meets the Commission's minimum distance separation requirements to all other licensed, applied for or proposed facilities, with the exception of WWKZ, Channel 278C, New Albany, Mississippi. Both Exhibits assume that Channel 234A has been substituted for Channel 279A, or has been deleted without substitution.

8. Channel 234A can be allotted to Wilson, Arkansas, at geographic coordinates North Latitude 35° 29' 46" and West Longitude 90° 10' 04". This represents a site restriction of 14.1 kilometers southwest of Wilson to avoid shortspacing WTRB-FM, Channel 235A, Ripley, and WOJG, Channel 234A, Bolivar (both Tennessee). From the reference site, a 3.16 mV/m contour can be delivered to Wilson, Arkansas. ⁵ Exhibit #3 is a usable area study for Channel 234A at Wilson, Arkansas. Exhibit #4 is a usable area map showing where a transmitter site for Channel 234A could be located to provide service to Wilson, Arkansas. Both Exhibits assume Channel 234C3 is not allotted to Earle, Arkansas.

5) Should the Commission re-instate the KOSE-FM construction permit, BPI has obtained the consent of Pollack Broadcasting to substitute Channel 234A for Channel 279A at Wilson, Arkansas and to relocate the KOSE-FM site. Channel 234A does not meet \$73.207 spacing requirements at the former KOSE-FM construction permit transmitter location.

9. Therefore, BPI requests the following amendment to §73.202(b) of the Commission's rules:

Como, Mississippi

Present
None

Proposed
278C

New Albany, Mississippi

Present
278C, 294C2

Proposed
294C2 6

Wilson, Arkansas

Present
279A

Proposed
234A or None

Earle, Arkansas

Present
None

Proposed
None or 234A

RESOLUTION TO CONFLICTS (Option 2)

10. In the event that the Commission makes the requested allotment to Earle, BPI has determined that there is an alternate channel available for allotment to Earle, which removes any conflict between its proposal and EB's

6) WNAU (AM) will also continue to provide full time licensed service to New Albany.

request. Channel 280C3 could be allotted to Earle, Arkansas, provided Channel 279A is deleted from Wilson, Arkansas (either substituted by Channel 234A or completely deleted without substitution). An allotment of Channel 280C3 to Earle, Arkansas, also requires that station KPOC-FM, Channel 280A, Pocahontas, Arkansas, be relocated to another channel.

11. BPI has also determined that Channel 281A can be substituted for Channel 280A at Pocahontas, Arkansas. By relocating KPOC-FM to Channel 281A, there is sufficient usable area for the allotment of Channel 280C3 at Earle, assuming Channel 279A is likewise removed from Wilson, Arkansas. BPI notes that Channel 281A does not meet the Commission's minimum distance separation requirements at the present KPOC-FM transmitter site. Therefore, BPI has received the consent of Scott Media Services, licensee of KPOC-FM, to substitute channels at Pocahontas, as well as a change of site for KPOC-FM. 7

12. Provided Channel 279A is removed from Wilson, Arkansas, and Channel 281A is substituted for Channel 280A at Pocahontas, Arkansas (as noted below), Channel 280C3 can be

7) Scott Media Services has been appraised that Channel 281A can be utilized, under §73.215 regulations, at the present KPOC-FM transmitter site, as a six kilowatt Class A facility. This assumes that the KPOC-FM antenna height above average terrain remains at its licensed value of 44.0 meters.

allotted to Earle, Arkansas, at reference coordinates North Latitude 35° 15' 20" and West Longitude 90° 38' 52". This represents a site restriction of 15.1 kilometers west of the community to avoid shortspacing WRVR-FM, Channel 283C1, Memphis, Tennessee. From the reference site, a 3.16 mV/m contour will be delivered to Earle. Exhibit #5 is a usable area study for Channel 280C3 at Earle, Arkansas. Exhibit #6 is a detailed spacing study, §73.207 of the Commissions rule's, which shows that Channel 280C3 meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facility (assuming Channel 279A at Wilson and Channel 280A at Pocahontas {both Arkansas} have been deleted).

13. Channel 281A can be allotted to Pocahontas, Arkansas, at reference coordinated North Latitude 36° 18' 02" and West Longitude 90° 53' 55". This represents a site restriction of 7.4 kilometers northeast from the community to avoid shortspacing KBCN, Channel 282C, Marshall, Arkansas. From the reference site, a 3.16 mV/m contour will be delivered to Pocahontas. ⁸ Exhibit #7 is a usable map which visually demonstrates where a transmitter site for Channel 281A could be located to provide service to Pocahontas. Exhibit #8 is a §73.207 spacing study from the reference site for Channel 281A and demonstrates Channel 281A meets the

8) See note 7 *supra*.

Commission's minimum distance separation requirements to all licensed, applied for, or proposed facilities (with the exception of the presently licensed KPOC-FM).

14. Therefore, BPI proposes the following changes to the Commission's table of FM allotments, §73.202(b) as a resolution to the mutually exclusive proposals:

Como, Mississippi

Present
None

Proposed
278C

New Albany, Mississippi

Present
278C, 294C2

Proposed
294C2 9

Wilson, Arkansas

Present
279A

Proposed
234A or None

Earle, Arkansas

Present
None

Proposed
234C3 or 280C3

Pocahontas, Arkansas

Present
280A

Proposed
281A

9) See note 6 *supra*.

PUBLIC INTEREST ASPECTS

15. The allotment of Channel 278C to Como, Mississippi, will provide first locally licensable service to this incorporated community of 1,387 persons, while not depriving New Albany of its only licensable service. Further, WWKZ, operating at Como as a maximum Class C facility (from the proposed reference site), would provide service to 1,050,536 persons. This represents an increase of 719,278 persons over its presently licensed facility at New Albany.

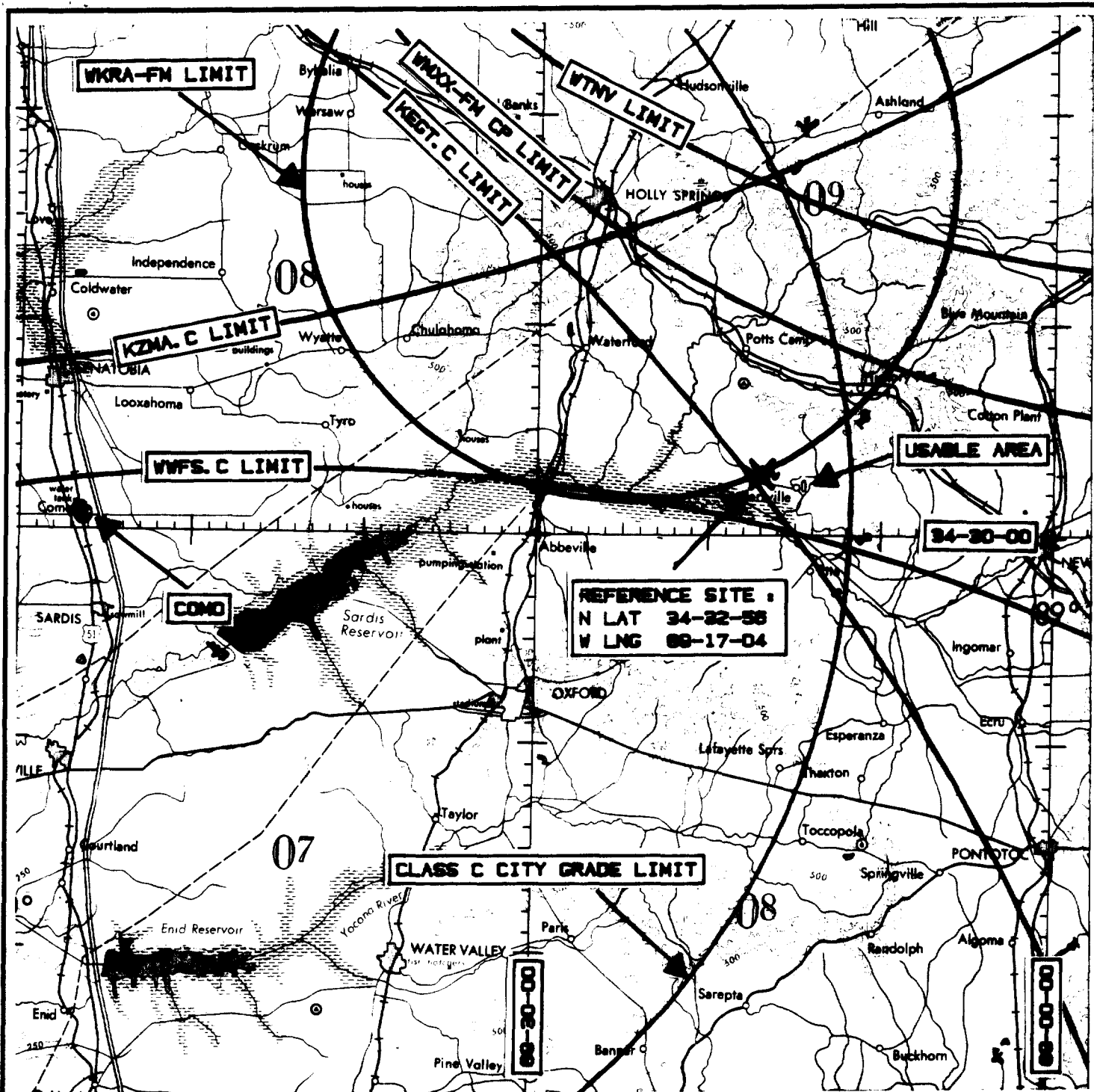
16. Should the Commission allot a Channel to Earle, Arkansas, which can be accommodated under Option 2, Earle, Arkansas, will likewise be able to receive its first local broadcast outlet. In addition, the changes proposed Option 2 would enable KPOC-FM, Pocahontas, Arkansas, to operate as a 6.0 kilowatt Class A facility from its present site, thus enabling that station to increase its population coverage from 13,195 persons to 17,639 persons. 10

17. Once Channel 278C is allotted to Como, Mississippi, BPI will file, on a timely basis, an application to make minor changes in the facilities of WWKZ to change its

10) see note 7 *supra*.

community of license to Como, Mississippi, and make the necessary facilities changes to enable city grade coverage of Como, Mississippi.

18. The foregoing technical statement and exhibits were prepared on behalf of Broadcasters & Publishers, Inc., by Bromo Communications, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. Should questions arise during consideration of these requests, we would welcome the opportunity to discuss the matter by phone at (912) 638-5608. All data relating to FM allotments and facilities was extracted from the NTIA database, as update on October 28, 1993. We assume no liability for omissions or errors in that database which might be contrary to the requests proposed herein.

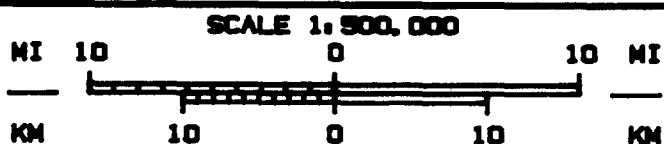


USABLE AREA CHANNEL 278C

MAP IS A PORTION OF THE 1:500,000 SCALE
MEMPHIS SECTIONAL AERONAUTICAL CHART.

MAP ASSUMES CHANNEL 278A NO LONGER
ALLOTTED TO WILSON, ARKANSAS.

EXHIBIT #1
COMMENTS & COUNTERPROPOSAL
MM DOCKET #93-259
BROADCASTERS & PUBLISHERS
ALLOT CHANNEL 278C
COMO, MISSISSIPPI
November 1993



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TECHNICAL CONSULTANTS
St Simons Island, Georgia
Washington, D.C.

ALLOCATION STUDY FOR CHANNEL 278C COMO, MISSISSIPPI
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS C	DISPLAY DATES
34 32 56 N		DATA 10-28-93
89 17 04 W	Current rules spacings	SEARCH 11-17-93
----- CHANNEL 278 -103.5 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD278	278C	Como	MS	0.0	0.00	290.0	-290.00
AD	34 32 56	89 17 04	0.000 kW	0M	0.0	180.2	
Broadcasters & Publishers, Inc							
WMKZ	278C	New Albany	MS	114.5	40.41	290.0	-249.59
LI CN	34 23 52	88 53 03	100.000 kW	306M	25.1	180.2	
Broadcasters & Publishers, Inc BLH-880307KE							
WKRAFM	224A	Holly Springs	MS	335.3	29.00	29.0	0.00
LI CN	34 47 11	89 25 00	3.000 kW	91M	18.0	18.0	
Ralph H. Doxey BLH-7097							
KEGT.C	278A	Lake Village	AR	231.8	227.35	226.0	1.35
CP CN	33 16 56	91 13 02	6.000 kW	100M	141.3	140.5	
Lula May Stone BPH-910102ME							
WWFS.C	277C3	Kosciusko	MS	193.2	179.38	176.0	3.38
CP CN	32 58 27	89 43 32	25.000 kW	100M	111.5	109.4	
Jesse J. Fleming BPH-891130MQ							
WMXXFM	276C2	Jackson	TN	22.8	117.53	105.0	12.53
CP ZCN	35 31 33	88 47 10	35.000 kW	176M	73.1	65.3	
Liberty Radio II, Inc. BPH-930317IA							
KZMA.C	278C2	Poplar Bluff	MO	339.6	272.03	249.0	23.03
CPM CN	36 50 50	90 19 52	50.000 kW	99M	169.1	154.8	
Twin Eagle Communications BMPH-930111IF							
WTVN	281C1	Jackson	TN	18.7	128.51	105.0	23.51
LI DEN	35 38 46	88 49 57	100.000 kW	201M	79.9	65.3	
Currey Broadcasting Corporation BLH-7816							

SPACING STUDY CHANNEL 278C

**STUDY ASSUMES CHANNEL 278A NO LONGER
ALLOTTED TO WILSON, ARKANSAS.**

EXHIBIT #2

**COMMENTS & COUNTERPROPOSAL
MM DOCKET #93-259
BROADCASTERS & PUBLISHERS
ALLOT CHANNEL 278C
COMO, MISSISSIPPI
November 1993**

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St Simons Island, Georgia Washington, D.C.

ALLOCATION STUDY FOR CHANNEL 234A WILSON, ARKANSAS
USING PROPOSED ALLOCATION SITE AS REFERENCE

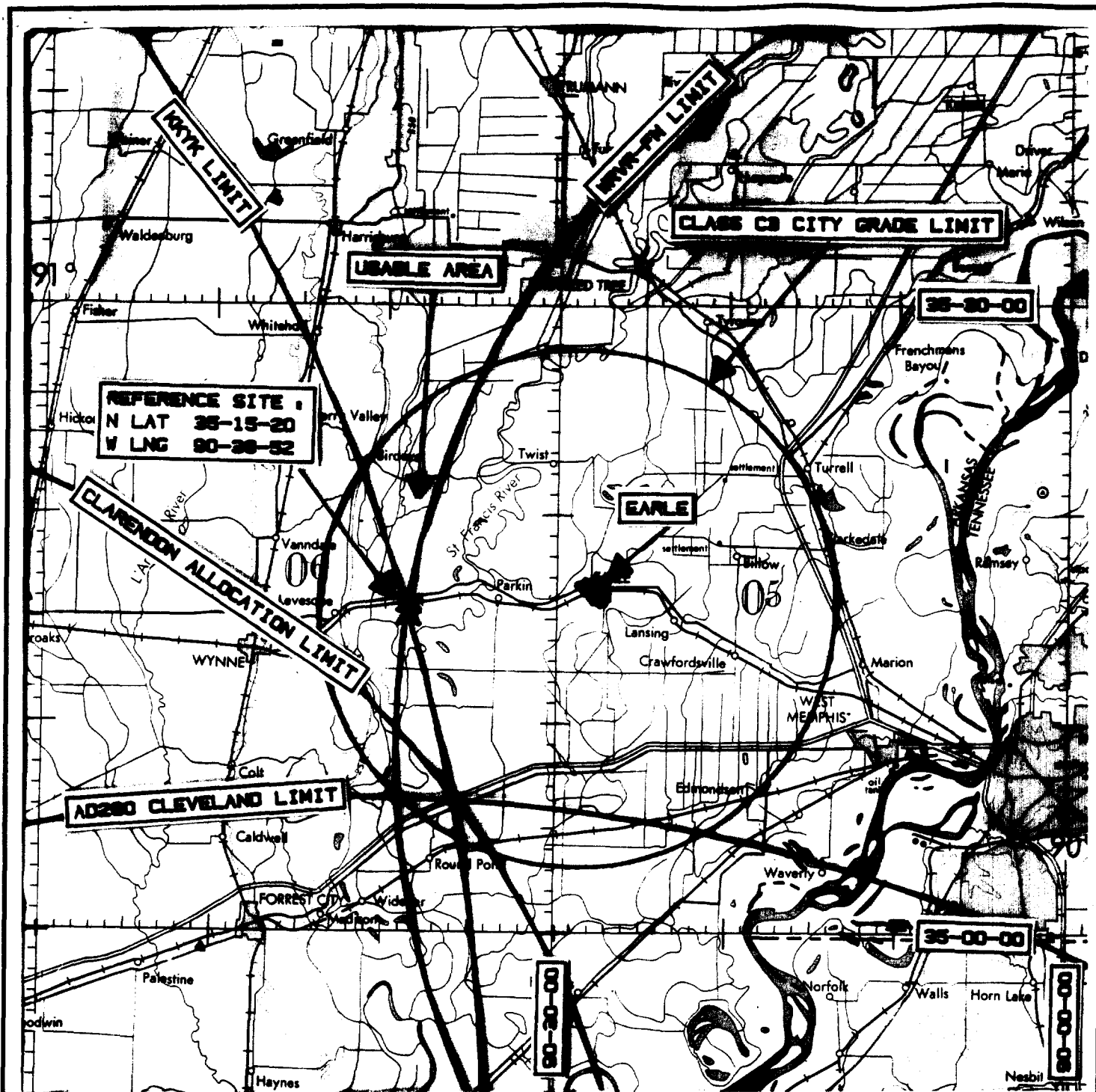
REFERENCE	CLASS A	DISPLAY DATES
35 29 46 N		DATA 10-28-93
90 10 04 W	Current rules spacings	SEARCH 11-17-93
----- CHANNEL 234 - 94.7 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD234	234A	Wilson	AR	0.0	0.00	115.0	-115.00
	35 29 46	90 10 04	0.000 kW	0M	0.0	71.5	
Broadcasters & Publishers, Inc							
WTRBFM	235A	Ripley	TN	60.8	72.01	72.0	0.01
LI CN	35 48 47	89 28 26	6.000 kW	100M	44.8	44.8	
Lauderdale Broadcasting Company					BLH-921214KA		
WOJG	234A	Bolivar	TN	102.2	115.22	115.0	0.22
LI CN	35 16 39	88 55 41	6.000 kW	100M	71.6	71.5	
Johnny and Opel Shaw					BLH-920807KB		
WHLE.A	235A	Byhalia	MS	145.0	77.27	72.0	5.27
AP ZCN	34 55 33	89 40 50	6.000 kW	100M	48.0	44.8	
Albert L. Crain					BMPH-930928IC		
WOGYFM	231C2	Germantown	TN	153.7	62.70	55.0	7.70
LI ZCN	34 59 22	89 51 45	50.000 kW	144M	39.0	34.2	
Ardman Broadcasting Corporation					BLH-921112KB		
KKLR	233C1	Poplar Bluff	MO	350.3	142.58	133.0	9.58
LI CN	36 45 46	90 26 03	100.000 kW	246M	88.6	82.7	
Bluff City Broadcasting, Inc.					BLH-890907KC		

SPACING STUDY CHANNEL 234A

EXHIBIT #4
COMMENTS & COUNTERPROPOSAL
MM DOCKET #93-259
BROADCASTERS & PUBLISHERS
ALLOT CHANNEL 278C
COMO, MISSISSIPPI
November 1993

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Washington, D.C.



USABLE AREA CHANNEL 280C3

MAP IS A PORTION OF THE 1:500,000 SCALE
MEMPHIS SECTIONAL AERONAUTICAL CHART.

MAP ASSUMES KPOC-FM ON CHANNEL 281A.

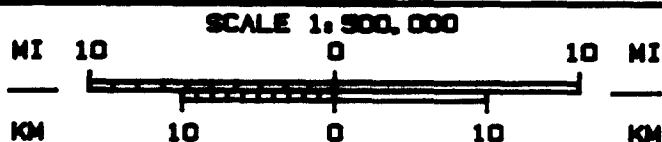


EXHIBIT #5

COMMENTS & COUNTERPROPOSAL
MM DOCKET #93-259
BROADCASTERS & PUBLISHERS
ALLOT CHANNEL 278C
COMO, MISSISSIPPI

November 1993

BUROMO
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST
TECHNICAL CONSULTANTS

Washington, D.C.

ALLOCATION STUDY FOR CHANNEL 280C3 EARLE, ARKANSAS
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS C3	DISPLAY DATES
35 15 20 N		DATA 10-28-93
90 38 52 W	Current rules spacings	SEARCH 11-17-93
----- CHANNEL 280 -103.9 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD280	280C3 Earle		AR	0.0	0.00	153.0	-153.00 *
	35 15 20	90 38 52	0.000 kW	OM	0.0	95.1	
	Broadcasters & Publishers, Inc						
WRVRFM	283C1 Memphis		TN	98.5	76.00	76.0	0.00
LI CN	35 09 17	89 49 20	100.000 kW	229M	47.2	47.2	
	Keymarket Communications				BLH-6379		
KKYK	279C Little Rock		AR	253.3	176.42	176.0	0.42
LI CY	34 47 55	92 29 58	100.000 kW	460M	109.7	109.4	
	Shepard Communications of Ark				BMLH-841221KS		
ALOPEN	281A Clarendon		AR	223.6	97.00	89.0	8.00
AL N	34 37 19	91 22 46	0.000 kW	OM	60.3	55.3	
	MM Docket # 90-651						
Effective 11-9-92 - Rsvd for KXRC Per Docket #90-651-App for review.							
AD280	280C3 Cleveland		MS	181.4	168.94	153.0	15.94
AD	33 43 59	90 41 38	0.000 kW	OM	105.0	95.1	
	Radio Cleveland, Inc.				RM8175	930107	
>PRM							

SPACING STUDY CHANNEL 280C3

STUDY ASSUMES KPOC-FM ON CHANNEL 281A.

EXHIBIT #6

COMMENTS & COUNTERPROPOSAL
MM DOCKET #93-258
BROADCASTERS & PUBLISHERS
ALLOT CHANNEL 278C
COMO, MISSISSIPPI
November 1993

BROMO
COMMUNICATIONS

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